UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

JILL HINES, ET AL.,

Civil Action No. 3:23-cv-00571

Plaintiffs,

Chief Judge Terry A. Doughty

v.

Magistrate Judge Kayla D. McClusky

ALEX STAMOS, ET AL.,

Defendants.

DEFENDANT THE ASPEN INSTITUTE'S MOTION TO STAY PROCEEDINGS PENDING RESOLUTION OF THE OTHER DFENDANTS' APPEAL OF THE DENIAL OF THEIR MOTION TO COMPEL ARBITRATION

NOW INTO COURT through undersigned counsel, comes defendant, The Aspen Institute ("Aspen"), which asks this Court to stay proceedings on the claims against it during the other Defendants' interlocutory appeal of this Court's Order denying their motion to compel arbitration. Aspen was added as a defendant in an amended complaint after the other Defendants filed that motion, and Aspen is now filing its own motion to compel arbitration. It would be a waste of judicial and party resources to re-litigate arbitration issues similar to those that are currently pending before the Fifth Circuit. Aspen is also filing a motion to dismiss that raises arguments similar to those addressed in the other Defendants' pending motion to dismiss. It would waste judicial and party resources to litigate Aspen's motion and then later separately litigate similar, but not identical, arguments raised by the other Defendants.

Accordingly, Aspen respectfully requests that this Court enter an Order staying all litigation of Plaintiffs' claims against Aspen until final resolution of the other Defendants' appeal of the denial of their motion to compel arbitration.

Dated: December 18, 2023 Respectfully submitted,

By: /s/ Elizabeth M. Carmody
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Attorneys for Defendant The Aspen Institute

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of December, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will provide notice of electronic filing to the attorneys for all parties.

/s/ Elizabeth M. Carmody

Elizabeth Mendell Carmody